



88593

May 4, 1988

*Received  
5/6/88*

Mr. Michael Nalbone  
New Jersey Department of Environmental  
Regulations  
Bureau of Environmental Evaluation  
& Cleanup Responsibility Assessment  
401 E. State St., 5th Fl.  
Trenton, NJ 08625

Re: ECRA Case No. 86009, Hexcel Corporation, Lodi, New  
Jersey

Dear Mr. Nalbone:

I have received and reviewed the letter from the Bureau of Environmental Evaluation and Cleanup Responsibility Assessment (BEECRA), dated April 26, 1988 regarding ENVIRON's proposed amendment to the environmental sampling plan for the Fine Organics Corporation facility (formerly owned by Hexcel Corporation) in Lodi, New Jersey. Two issues remain as concerns regarding the plan as approved. These include 1) the use of deep soil borings to test for chemicals in soil below the water table and 2) the need to conduct additional full priority pollutant analyses in areas which have already been tested and found to not contain some of the major classes of priority pollutants (e.g., acid extractable and base/neutral extractable organics). As we discussed on May 3, 1988, I am requesting a meeting during the week of May 25, 1988 with you and other staff at the BEECRA to discuss these two issues further. In the interim we are proceeding with the scheduling and planning to begin the field investigations by late May, 1988.

As we discussed our concern regarding the deeper soil boring program is related to issues of 1) the direction of future remedial programs (i.e., would contamination discovered within the saturated zone be remediated as a soil or ground water problem and what cleanup criteria would apply?), 2) the sensitivity of chemical tests of water vs. soil samples and 3) the potential for causing the spread of any contamination in the shallower water table unit into deeper zones. This latter issue is of particular concern since data developed at the site over the past year suggest that the shallowest saturated zone, which lies above a clay confining unit, is contaminated in certain areas with VOCs, oil and PCBs. These findings and the likelihood that any deeper contamination would be remediated as a ground water problem (for which ground water data

May 4, 1988

would be more relevant) argue against the drilling of deeper borings for the collection of soil samples, which would increase the potential for spreading the shallower contamination into deeper zones.

As you know, ENVIRON had proposed in the amended sampling plan to conduct chemical testing of environmental samples in certain areas for only those constituents which had previously been identified during the prior chemical tests conducted in 1985. In general these constituents included VOCs, TPHCs and PCBs. Some portions of the site which had not already been tested for priority pollutants were also recommended by ENVIRON for a broader based priority pollutant + 40 analysis. These include AEC nos. 6, 8, 9, 11 and a background sample.

During the prior testing by Princeton Aqua Science (PAS) in June 1985, priority pollutant analyses were conducted in AEC nos. 2, 3/4, 5, 7 and 10 at the facility. The results of these tests were submitted to you in the original ECRA II submission. As I understand your response to ENVIRON's amended sampling plan, the BEECRA does not feel it can rely on these earlier priority pollutant tests because QA/QC documentation has not been provided for this work. The QA/QC reports for the June 1985 priority pollutant analyses by PAS were not available to ENVIRON when the original ECRA II submission was prepared and therefore were not included. *Did BS see this*

*Why is this*  
I inquired recently with PAS (now IT Corporation) regarding whether QA/QC documentation which would meet the general requirements of the BEERCA was still available for these samples. Since these prior tests by PAS were conducted before the establishment of the ECRA Tier II data package requirements by the BEERCA, a Tier II data package was not prepared by PAS and cannot be reconstructed in its entirety at this time; however the QA/QC documentation that is available from PAS has been compiled and is enclosed for your information. I believe that this documentation substantially meets the requirements of the ECRA Tier II data package and adequately documents the accuracy of these prior tests. Accordingly, I am requesting that the BEERCA reconsider its decision not to accept the prior priority pollutant analyses in certain areas of environmental concern, the results of which have already been submitted to your department. We are, of course, proposing to conduct additional priority pollutant analyses in areas which have not yet been tested.

At this time we are scheduling the field sampling program at the facility, which I anticipate will begin in the next few weeks. Since the chemical tests for the environmental samples that will be collected during this program must be specified before the samples are shipped to the laboratory, it is important that I have your early reply to this request to reconsider the need for priority

885930002

Mr. Nalbone

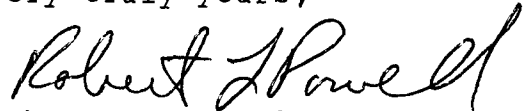
-3-

May 4, 1988

pollutant testing in AEC nos. 2, 5, 7 and 10. I would like to discuss this matter further during our planned meeting on May 25, 1988.

I anticipate that an extension of the 90 day time limit will be needed to complete the onsite investigation and develop cleanup plans. I understand from our discussion that an extension would be granted, if needed. I will submit a request for this extension following our meeting on May 25, 1988.

Very truly yours,

A handwritten signature in cursive script, reading "Robert L. Powell".

Robert L. Powell, Ph.D., P.E.  
Principal

RLP:slh  
0037h

Enclosure

cc: Edd Hogan  
A. William Nosil

885930003